

1 ADAM R. FULTON, ESQ.  
 2 Nevada Bar No. 11572  
 3 afulton@jfnavlaw.com  
 4 LOGAN G. WILLSON, ESQ.  
 5 Nevada Bar No. 14967  
 6 logan@jfnavlaw.com  
**JENNINGS & FULTON, LTD.**  
 7 2580 Sorrel Street  
 Las Vegas, NV 89146  
 Telephone: (702) 979-3565  
*Attorneys for Plaintiffs*

8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 TRACEY KOONCE, an individual,  
 11 Plaintiff,

Case No.: 2:22-cv-02061-CDS-DJA  
 (Lead Case)

12 vs.  
 13 MGM GRAND HOTEL, LLC, a Nevada  
 Limited Liability Company; DOES I-X,  
 inclusive; and ROE CORPORATIONS I-  
 X, inclusive,

14 Defendant.

15 PAUL TAYLOR, an individual,  
 16 Plaintiff,

Consolidated With:  
 Case No.: 2:22-cv-02069-CDS-DJA

17 vs.  
 18 MGM GRAND HOTEL, LLC, a Nevada  
 Limited Liability Company; DOES I-X,  
 inclusive; and ROE CORPORATIONS I-  
 X, inclusive,

19 Defendants.

20 DAVID PERSI, an individual,  
 21 Plaintiff,

Consolidated With:  
 Case No.: 2:22-cv-02087-CDS-DJA

22 vs.  
 23 MGM GRAND HOTEL, LLC, a Nevada  
 Limited Liability Company; DOES I-X,  
 inclusive; and ROE CORPORATIONS I-  
 X, inclusive,

24 Defendants.

25

1 INGA HAKAN, an individual,  
 2 Plaintiff,  
 3  
 4 vs.  
 5 MGM RESORTS INTERNATIONAL, a  
 Foreign Corporation; DOES I-X, inclusive;  
 and ROE CORPORATIONS I-X, inclusive,  
 6 Defendants.

Consolidated With:  
 Case No.: 2:22-cv-02097-CDS-DJA

7 **STIPULATION AND ORDER TO VACATE**  
 8 **SEPTEMBER 18, 2023 EARLY NEUTRAL EVALUATION**

9 Plaintiff PAUL TAYLOR, by and through his attorneys of record, ADAM R. FULTON,  
 10 ESQ. and LOGAN G. WILLSON, ESQ., of the law firm of JENNINGS & FULTON, LTD., and  
 11 Defendant MGM GRAND HOTEL, LLC, by and through its attorneys of record, PAUL T.  
 12 TRIMMER, ESQ. and LYNNE K. MCCHRYSTAL, ESQ., of the law firm of JACKSON LEWIS  
 13 P.C., stipulate to vacate the Early Neutral Evaluation (“ENE”) currently scheduled for September  
 14 18, 2023.

16 Since the rescheduling of the ENE, the parties have conducted three (3) prior ENE’s in the  
 17 related cases *Hakan v. MGM Resorts International*, *Persi v. MGM Grand Hotel, LLC*, and *Koonce*  
 18 *v. MGM Grand Hotel, LLC*, and all pending matters were consolidated by the Court. In the course  
 19 of participating in the ENE’s in the related cases, the parties have had extensive discussions  
 20 regarding the claims and defenses which are common to all cases. The parties have also recently  
 21 engaged in settlement discussions in *Taylor v. MGM Grand Hotel, LLC*. The parties were unable to  
 22 reach a settlement of Mr. Taylor’s claims and request the Court vacate the ENE in *Taylor v. MGM*  
 23 *Grand Hotel, LLC* because the parties have currently exhausted settlement efforts at this phase of

25 ...

26 ...

27 ...

28

JENNINGS & FULTON, LTD.  
 2580 Sorel Street  
 Las Vegas, NV 89146  
 702.979.3565

1 the case and do not believe that further settlement negotiations will be effective so soon after the  
2 recent, unsuccessful attempts to reach an agreement.  
3

4 DATED: August 14th, 2023  
5

6 **JENNINGS & FULTON, LTD.**

7 /s/ Logan G. Willson, Esq.

8 ADAM R. FULTON, ESQ.  
Nevada Bar No. 11572  
LOGAN G. WILLSON, ESQ.  
Nevada Bar No. 14967  
2580 Sorrel Street  
Las Vegas, Nevada 89146

9 *Attorneys for Plaintiffs*

10 DATED: August 14th, 2023  
11

12 **JACKSON LEWIS P.C.**

13 /s/ Lynne K. McChrystal, Esq.

14 PAUL T. TRIMMER, ESQ.  
Nevada Bar No. 9291  
LYNNE K. MCCHRYSSTAL, ESQ.  
Nevada Bar No. 14739  
300 S. 4<sup>th</sup> Street, Ste. 900  
Las Vegas, Nevada 89101

15 *Attorneys for Defendants*

16 **ORDER**

17 IT IS SO ORDERED:  
18

19   
20 United States District Court/Magistrate Judge

21 9-14-2023  
22 Dated: \_\_\_\_\_  
23

24 JENNINGS & FULTON, LTD.  
25 2580 Sorrel Street  
26 Las Vegas, NV 89146  
27 702.979.3565  
28